

United States Environmental Protection Agency Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address

UPL NA Inc.

630 Freedom Business Center, Suite 402

King of Prussia, PA 19406

EPA File Symbol/Registration Number

70506-xxx

Product Name

Bifenthrin 180 FS

Date of Confidential Statement of Formula (EPA Form 8570-4)

01/31/2019

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Bifenthrin

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).
- (3) Indicate by checking (A) or (B) below which paragraph applies:
 - (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

- (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.
- (4) The following active ingredients in this product qualify for the formulator's exemption.

| Source | | | | | |
|-------------------|-----------------------------------|---------------------|--|--|--|
| Active Ingredient | Product Name | Registration Number | | | |
| Bifenthrin | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| Signature | Name and Title | Date | | | |
| Cabutan | Crystal Layton, Regulatory Manage | r 01/31/2020 | | | |

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 – EPA Copy 2 - Applicant copy

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| | DATA MA | ATRIX | | | |
|--------------------------------------------------------------------|------------------------------------------------------|------------------------------------|----------------------------------|--------------|----------------------------|
| Date August 30, 2017 | | | EPA Reg. No./File Symbol 70506-1 | 8 | Page 1 of 10 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. | | Product | | • | |
| | | | Bifenthrin Technical Insectici | de/Miticide | |
| | 630 Freedom Business Center, Suite 402 | | | | |
| | King of Prussia, PA 19406 | | | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.1550 | Product Identity and Composition | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |
| 830.1600 | Description of Materials Used to Produce the Product | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |
| 830.1620 | Description of Production Process | 45654401, 50363501 | United Phosphorus, Inc. | | |
| 830.1650 | Description of Formulation Process | | | | Not Required ¹ |
| 830.1670 | Discussion of Formation of Impurities | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |
| 830.1700 | Preliminary Analysis | 45654401, 50363501, 50363502 | United Phosphorus, Inc. | OWN | |
| 830.1750 | Certified Limits | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |
| 830.1800 | Enforcement Analytical Method | 45654401, 50363501, 50363502 | United Phosphorus, Inc. | OWN | |
| 830.6302 | Color | 45654402 | United Phosphorus, Inc. | OWN | |
| Signature | | | Name and Title | | Date |
| D | Jean At- | | P. Leanne Pruett, Regulatory | / Consultant | August 30, 20 |

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| send the form to this address. | | | | | |
|-----------------------------------|--------------------------------------------------------------------------|-----------------------|----------------------------------|------------|-----------------------------------------------------------------|
| | DATA | MATRIX | | | |
| Date August 30, 2017 | | | EPA Reg. No./File Symbol 70506-1 | 8 | Page 2 of 10 |
| Applicant's / Registrant's Name 8 | & Address | | Product | | |
| United Phosphorus, Inc. | | | Bifenthrin Technical Insectici | | |
| | 630 Freedom Business Center, Suite 4 | 02 | | | |
| | King of Prussia, PA 19406 | | | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.6303 | Physical State | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6304 | Odor | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6313 | Stability to Normal and Elevated Temperatures, Metals, and Metal Ions | 45654403 | United Phosphorus, Inc. | OWN | |
| 830.6314 | Oxidation/Reduction: Chemical Incompatibility | 45838001 | United Phosphorus, Inc | OWN | |
| 830.6315 | Flammability | 45838001 | United Phosphorus, Inc | OWN | |
| 830.6316 | Explodability | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.6317 | Storage Stability | 45654403, 46414201 | United Phosphorus, Inc. | OWN | |
| 830.6319 | Miscibility | | | | Not Required ² |
| 830.6320 | Corrosion Characteristics | 46414201 | United Phosphorus, Inc. | OWN | |
| 830.6321 | Dielectric Breakdown Voltage | | | | Not Required ² |
| 830.7000 | pH | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.7050 | UV/Visible Absorption | CITE ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| Signature | | | Name and Title | | Date |
| P | Jean At- | | P. Leanne Pruett, Regulatory | Consultant | August 30, 2017 |

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| | DATA N | IATRIX | | | | |
|---------------------------------|------------------------------------------------------------------------------|-----------------------|----------------------------------|-------------------------------------------|----------------------------------------------------------------|--|
| Date August 30, 2017 | | | EPA Reg. No./File Symbol 70506-1 | 8 | Page 3 of 10 | |
| Applicant's / Registrant's Name | & Address | | Product | | | |
| | United Phosphorus, Inc. | | Bifenthrin Technical Insectici | Bifenthrin Technical Insecticide/Miticide | | |
| | 630 Freedom Business Center, Suite 402 | 2 | | | | |
| | King of Prussia, PA 19406 | | | | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note | |
| 830.7100 | Viscosity | | | | Not Required ² | |
| 830.7200 | Melting Point/Melting Range | 45838001 | United Phosphorus, Inc. | OWN | | |
| 830.7220 | Boiling Point/Boiling Range | 45838001 | United Phosphorus, Inc. | OWN | | |
| | | 45838001, | | | | |
| 830.7300 | Density/Relative Density/Bulk Density | 46008501, 46008502 | United Phosphorus, Inc. | OWN | | |
| 830.7370 | Dissociation Constants in Water | 45838001 | United Phosphorus, Inc., | OWN | | |
| 830.7520 | Particle size, fiber length, diameter distribution | | | | Not Required ² | |
| 830.7550 | Partition Coefficient (n-octanol/water), Shake Flask Method | CITE-ALL | | PAY | See list of companie in 'Generic Data' section of Matrix | |
| 830.7560 | Partition Coefficient (n-octanol/water), Generator Column Method | | | | See 830.7550 | |
| 830.7570 | Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography | | | | See 830.7550 | |
| 830.7840 | Water Solubility: Column Elution Method; Shake Flask Method | CITE-ALL | | PAY | See list of companion 'Generic Data' section of Matrix | |
| Signature | | | Name and Title | | Date | |
| D | Jeans PA- | | P. Leanne Pruett, Regulatory | Consultant | August 30, 20 | |

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| | DATA | MATRIX | | | |
|------------------------------------------------------------------------------------------|-------------------------------------------|-------------------------------------------|-----------------------------------|--------|-----------------------------------------------------------|
| Date August 30, 2017 | | | EPA Reg. No./File Symbol 70506-18 | | Page 4 of 10 |
| Applicant's / Registrant's Name & | & Address | | Product | | |
| United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | Bifenthrin Technical Insecticide/Miticide | | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.7860 | Water Solubility, Generator Column Method | | | | See 830.7840 |
| 830.7950 | Vapor Pressure | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| 870.1100 (81-1) | Acute Oral Toxicity: Rat | 45654404 | United Phosphorus, Inc. | OWN | |
| 870.1200 (81-2) | Acute Dermal Toxicity: Rat | 45654405 | United Phosphorus, Inc. | OWN | |
| 870.1300 (81-3) | Acute Inhalation Toxicity: Rat | 00155286 | FMC Corporation | OLD | |
| 870.2400 (81-4) | Primary Eye Irritation: Rabbit | 00132522 | FMC Corporation | OLD | |
| 870.2500 (81-5) | Primary Dermal Irritation | 00132521 | FMC Corporation | OLD | |
| 870.2600 (81-6) | Dermal Sensitization | 00132523 | FMC Corporation | OLD | |
| | | | | | |

| Signature | Name and Title | Date |
|-------------|-----------------------------------------|-----------------|
| P. Seum FA- | P. Leanne Pruett, Regulatory Consultant | August 30, 2017 |

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| seria the form to this address. | | | | | |
|-------------------------------------|----------------------------------------------------------------------------------------------------|-------------|---------------------------------------------------------|-----------|----------------------------|
| | DATA MA | ATRIX | | | |
| Date August 30, 2017 | | | EPA Reg. No./File Symbol 70506-18 | | Page 5 of 10 |
| Applicant's / Registrant's Name & A | Address | | Product | | |
| | United Phosphorus, Inc. | | Bifenthrin Technical Insecticide/ | Miticide | |
| | 630 Freedom Business Center, Suite 402 | | | | |
| | King of Prussia, PA 19406 | | | | |
| Ingredient Bifenthrin (CAS N | lo. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| Product Specific and Ge | eneric Data Requirements | | | | |
| | (UPI) is using the cite-all option to satisfy generic data | | | | |
| | n (128825). UPI will make offers-to-pay to the following 2017 Data Submitters List for bifenthrin. | | | | |
| companies on the sary of | 2017 Bata Gastilitario Elector Shoritimin. | Cite-All | Syngenta Crop Protctn, Greensboro NC | PAY | |
| | | Cite-All | Nufarm Americas, Inc., Morrisville, NC | PAY | |
| | | Cite-All | The Scotts Co. dba Ortho, Marysville, OH | PAY | |
| | | Cite-All | Bayer Cropscience LP; RTP, NC | PAY | |
| | | Cite-All | FMC Corp.; Philadelphia, PA | PAY | |
| | | Cite-All | Bayer Env. Science; RTP, NC | PAY | |
| | | Cite-All | BASF Corp, RTP, NC | PAY | |
| | | Cite-All | The Scotts Co., Marysville, OH | PAY | |
| | | Cite-All | Lebanon Seaboard Corp., Lebanon, PA | PAY | |
| | | Cite-All | McLaughlin Gormley King Co, dba MGK, Minneapolis, MN | PAY | |
| | | Cite-All | Fuller Systems, Inc., Woburn, MA | PAY | |
| Signature | | | Name and Title | | Date |
| - | Jeum PA- | | P. Leanne Pruett, Regulatory Co | onsultant | August 30, 2017 |

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| seria tile lettii te tilis address. | | | | | |
|-------------------------------------|--------------------------|-------------------|------------------------------------------------------------------|-----------|----------------------------|
| | | DATA MATRIX | | | |
| Date August 30, 2017 | | | EPA Reg. No./File Symbol 70506-18 | | Page 6 of 10 |
| Applicant's / Registrant's Name & | Address | | Product Bifenthrin Technical Insecticide/Miticide | | |
| | United Phosphorus, Inc. | | | | |
| | 630 Freedom Business C | Center, Suite 402 | | | |
| | King of Prussia, PA 1940 | 6 | | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | Cite-All | Winfield Solutions, LLC, St. Paul, MN | PAY | |
| | | Cite-All | Sergeant's Pet Care Prd's, Omaha, NE | PAY | |
| | | Cite-All | Aceto Ag. Chemicals Corp., Port Washington, NY | PAY | |
| | | Cite-All | S. C. Johnson & Son, Inc., Racine, WI | PAY | |
| | | Cite-All | Amvac Chm Corp., Newport Beach, CA | PAY | |
| | | Cite-All | Helena Chemical Co., Memphis, TN | PAY | |
| | | Cite-All | Southern States Co-op., Inc, Salem, VA | PAY | |
| | | Cite-All | Nippon Soda Co., Ltd., New York, NY | PAY | |
| | | Cite-All | The Andersons, Inc., Maumee, OH | PAY | |
| | | Cite-All | Sunniland Corp., Sanford, FL | PAY | |
| | | Cite-All | Chemsico, St. Louis, MO | PAY | |
| | | Cite-All | Lesco, Inc., Cleveland, OH | PAY | |
| | | Cite-All | ADAMA Makhteshim Ltd, c.o. Makhteshim Agan of NA, Raleigh, NC | PAY | |
| | | Cite-All | Loveland Products, Inc., Greeley, CO | PAY | |
| Signature | | | Name and Title | | Date |
| _ | Jeune PA- | | P. Leanne Pruett, Regulatory C | onsultant | August 30, 2017 |

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| | DATA N | IATRIX | | | |
| Date August 30, 2017 | | | EPA Reg. No./File Symbol 70506-18 | | Page 7 of 10 |
| Applicant's / Registrant's Name & | Address | | Product | | |
| | United Phosphorus, Inc. | | Bifenthrin Technical Insecticide/Miticide | | |
| | 630 Freedom Business Center, Suite 40 | 2 | | | |
| King of Prussia, PA 19406 | | | | | |
| Ingredient Bifenthrin (CAS N | No. 82657-04-3) | | <u> </u> | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | Cite-All | Howard Fertilizer & Chm. Co., Salem, VA | PAY | |
| | | Cite-All | Albaugh, LLC, Valdosta, GA | PAY | |
| | | Cite-All | BASF Sparks, LLC, RTP, NC | PAY | |
| | | Cite-All | Control Solutions, Inc., Pasadena, TX | PAY | |
| | | Cite-All | Arizona Chm Grp, c/o Pyxis Regulatory Consulting, Gig Harbor, WA | PAY | |
| | | Cite-All | Valent USA LLC, Walnut Creek, CA | PAY | |
| | | Cite-All | Pyrethroid Working Grp, c/o Landis, Valdosta, GA | PAY | |
| | | Cite-All | Makhteshim Agan of NA, Raleigh, NC | PAY | |
| | | Cite-All | Arysta Lifescience NA, Cary, NC | PAY | |
| | | Cite-All | Spray Drift TF, Washington, DC | OWN | |
| | | Cite-All | Bengal Products, Inc., Baton Rouge, LA | PAY | |
| | | Cite-All | Outdoor Res Exp TF, Washington DC | OWN | |
| | | Cite-All | Ag Reentry TF, Washington, DC | OWN | |
| | | | | | |
| Signature | | | Name and Title | | Date |
| P | Years At- | | P. Leanne Pruett, Regulatory Co | onsultant | August 30, 2017 |

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| | DATA I | MATRIX | | | |
| Date August 30, 2017 | | | EPA Reg. No./File Symbol 70506-18 | | Page 8 of 10 |
| Applicant's / Registrant's Name & | Address | | Product | | |
| | United Phosphorus, Inc. | | Bifenthrin Technical Insecticide/Miticide | | |
| | 630 Freedom Business Center, Suite 40 |)2 | | | |
| | King of Prussia, PA 19406 | | | | |
| Ingredient Bifenthrin (CAS N | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | Cite-All | Sapstain Industry Group, Titusville, NJ | PAY | |
| | | Cite-All | Non-Dietary Exp TF, Washington, DC | PAY | |
| | | Cite-All | Nisso LLC, New York, NY | PAY | |
| | | Cite-All | Univar Env. Sciences, Brookfield, CT | PAY | |
| | | Cite-All | FIFRA Engangered Species TF, Lakewood, WA | PAY | |
| | | Cite-All | Residential Exposure JV, Washington, DC | PAY | |
| | | Cite-All | Atex, Inc. c/o Landis, Valdosta, GA | PAY | |
| | | Cite-All | Ag Handler Exposure TF, Macon, MO | PAY | |
| | | Cite-All | Osmose Utilities Svcs, Inc, P'tree City GA | PAY | |
| | | Cite-All | Ensystex II, c/o Pyxis, Gig Harbor, WA | PAY | |
| | | Cite-All | Sharda Cropchem Ltd., c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Winfield Solutions, LLC, St. Paul, MN | PAY | |
| | | Cite-All | Tacoma Ag.,c/o Pyxis, Gig Harbor, WA | PAY | |
| | | | | | |
| Signature | | | Name and Title | | Date |
| P | Year At- | | P. Leanne Pruett, Regulatory Co | onsultant | August 30, 2017 |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

| | DATA MA | ATRIX | | | |
|-----------------------------------|----------------------------------------|-------------|------------------------------------------------------------------|----------|----------------------------|
| Date August 30, 2017 | | | EPA Reg. No./File Symbol 70506-18 | | Page 9 of 10 |
| Applicant's / Registrant's Name & | Address | | Product | | |
| | United Phosphorus, Inc. | | Bifenthrin Technical Insecticide/I | Miticide | |
| | 630 Freedom Business Center, Suite 402 | | | | |
| King of Prussia, PA 19406 | | | | | |
| Ingredient Bifenthrin (CAS N | lo. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | Cite-All | Sharda USA LLC, c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Ensystex IV, c/o Pyxis, Gig Harbor, WA | PAY | |
| | | Cite-All | Wet & Forget USA Ltd, c/o Lewis & Harrison, Washington, DC | PAY | |
| | | Cite-All | Generic Endangered Species TF, c/o Pyxis, Gig Harbor, WA | OWN | |
| | | Cite-All | Kaizen Technologies, Johnston, CO | PAY | |
| | | Cite-All | Bifenthrin TF, c/o CSPA, Washington, DC | OWN | |
| | | Cite-All | Vive Crop Prot. Inc., c/o OMC AG Consulting, East Lansing, MI | PAY | |
| | | Cite-All | Liberty Crop Protection, Loveland, CO | PAY | |
| | | Cite-All | Prime Source c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Genmerica NA, c/o GHB, LeMars, IA | PAY | |
| | | Cite-All | Tevra Brands, LLC, Omaha, NE | PAY | |

| Signature | Name and Title | Date |
|--------------|-----------------------------------------|-----------------|
| P. Jeann PA- | P. Leanne Pruett, Regulatory Consultant | August 30, 2017 |

Endnotes for Data Matrix for Bifenthrin Technical Insecticide/Miticide August 30, 2017

¹ 830.1650 – per OSCPP 830.1000 guidelines, these data are not required for the registration of a technical grade active ingredient. See 830.1620 for production process information.

² 830.6319, 830.6321, 830.7100, 830.7520 - Per OSCPP 830.1000 guidelines, these data are not required for the registration of a technical grade active ingredient. Additionally, this product is not a liquid, is not a fibrous material, and is not used around electrical equipment

| \$EPA | Environmenta | Inited States I Protection Ington, DC 204 | | су | | | Registra Amendi Other | | OPP Identifier Number |
|---------------------------------------------------------------------------|----------------------------------------------------------|--------------------------------------------|---------------------|----------------------------|-------------------------------------------------------------|--------------------|-----------------------------|------------------------------------|--------------------------------------------------|
| | | Application | n for Po | estici | de - Sect | ion I | | | |
| 1. Company/Product Numb | er | | | 2. EPA | Product Mana | ager | | 3. Pi | roposed Classification |
| 4. Company/Product (Name |) | | | PM# | | | | | |
| 5. Name and Address of Ap | | ode) | | (b)(i), r to: | ny product is | s simil | ar or ident | ical in co | FIFRA Section 3(c)(3) emposition and labeling |
| Check if thi | is is a new address | | | CONTRACTOR OF THE PARTY OF | ct Name _ | | | | |
| | | | Secti | on - | 11 | | | | |
| Amendment - Explain Resubmission in res Notification - Explain | panse to Agency letter | dated | | - [| Final printed Agency lette "Me Too" A Other - Expl | er date pplicat | d ion. | e to | |
| | | | Section | on - I | 11 | | | | |
| 1. Material This Product Wi | il Be Packaged In: | | | | | | | | |
| Child-Resistant Packaging Yes No Certification must be submitted | Unit Packaging Yes No If "Yes" Unit Packaging wgt. | No. per container | Y | 'es lo | No. per container | | 2. Type of | Metal Plastic Glass Paper Other (S | |
| 3. Location of Net Contents | Information Container | 4. Size(s) Reta | ail Containe | 10 | 1 | 5. Loca | ation of Lab | el Directio | |
| 6. Manner in Which Label is | | Lithogr Paper Stencil | raph glued ed | | Other | | | | |
| | | | Section | n - I | V | | | | |
| 1. Contact Point (Complete | items directly below f | or identification | n of individu | ual to b | e contacted, i | f neces | sary, to pr | ocess this | application.) |
| Name P. Leanne Pruett | | 1 | Title Agent | | | | | Telephon 253-85 | e No. (Include Area Code) 3-7369 |
| I certify that the state I acknowledge that a both under applicable | oments I have made on ny knowlinglly false or law. | Certificate this form and misleading state | all attachme | ents the | ereto are true, nishable by fin | accura | ate and com | nplete. | 6. Date Application Received (Stamped) |
| 2. Signature | ine Pri | 1 | 3. Title Agent | | | | | | |
| . Typed Name | | | 5. Date | | | | | | |

P. Leanne Pruett



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

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| Do not send the completed form to this address. | | | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|
| Certification with Respec | t to Citation of | Data | | | | |
| Applicant's/Registrant's Name, Address, and Telephone Number | | EPA Registration Number/File Symbol | | | | |
| Active Ingredient(s) and/or representative test compound(s) | | Date | | | | |
| General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158 | 3) | Product Name | | | | |
| NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27). | | | | | | |
| I am responding to a Data-Call-In Notice, and have included with this form a be used for this purpose). | list of companies se | ent offers of compensation (the Data Matrix form should | | | | |
| SECTION I: METHOD OF DATA SUP | PORT (Check one m | nethod only) | | | | |
| I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose). | under the | g the selective method of support (or cite-all option e selective method), and have included with this form a d list of data requirements (the Data Matrix form must be | | | | |
| SECTION II: GENERAL | OFFER TO PAY | | | | | |
| [Required if using the cite-all method or when using the cite-all option under the selection of the cite-all options of the cite-a | | 00 01 00000 000 000 000 01 0000 0000 0 | | | | |
| SECTION III: CERT | IFICATION | | | | | |
| application for registration, the form for reregistration, or the Data-Call-In response. In indicated in Section I, this application is supported by all data in the Agency's files that substantially similar product, or one or more of the ingredients in this product; and (2) | I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses . | | | | | |
| I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study. | or reregistration, the | at I am the original data submitter or that I have obtained | | | | |
| I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (l) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study. | | | | | | |
| I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA. | | | | | | |
| I certify that the statements I have made on this form and all attachm knowingly false or misleading statement may be punishable by fine or impriso | ents to it are true, nment or both und | accurate, and complete. I acknowledge that any ler applicable law. | | | | |
| Signature Pearso M | Date | Typed or Printed Name and Title P. Leanne Pruett, Agent | | | | |

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.

| Please read instructions on reve | | | | | For | m Approve | ed. OMB No | . 2070-0060. Approval expires 2-28-95 |
|----------------------------------------------------------------------|------------------------------|-------------------|---------------------|----------|----------------------------|----------------|-------------|----------------------------------------|
| _ | United | 0 10100 | | | | Regis | tration | OPP Identifier Number |
| SEPA En | vironmental | | on Age | ency | · 🔽 | _ | dment | |
| VIII A | Washington, | DC 20460 | | | | Other | | |
| | | | | | | | | |
| 4. O a managed Dura day of Normalia | | Application | | | | | | O. Daniela de Caratina de Caratina |
| Company/Product Number United Phosphorus, In | | | | 2. EPA | Product Mar K. [| nager Davis | | 3. Proposed Classification |
| 4. Company/Product (Name United Phosphorus, Inc. | | al Insecticide/N | | PM# 3 | | | | None Restricted |
| 5. Name and Address of Ap | plicant (include ZIP Co | | | 6. Exp | | | accordanc | e with FIFRA Section 3(c)(3)(b)(i), |
| United Phosphorus, In | | | 1 | | | or identica | I in compos | sition and labeling to: |
| c/o Pyxis Regulatory 4110 136 th St. Ct. NW | | | | | leg. No | - | | |
| Gig Harbor, WA 9833 | | | | Produ | ct Name | | | |
| , | | | Section | า - II | | | | |
| ✓ Amendment – Explain b | pelow. | | | | Final printed | | response t | to |
| Resubmission in respo | nse to Agency letter d | ated | | | Agency letter 'Me Too" App | | | |
| ☐ Notification – Explain below. | | | | | Other – Expla | | | |
| Evalenation II III | | | | | Other – Expre | an below. | • | |
| Explanation: Use addition This action falls under P | | | | | new unregi | stered s | ource of | active ingredient). The |
| | | | | | | | | PyxisRC.com if you have |
| any questions or need a | | | | () | | , | , | - , |
| | | | | | | | | |
| | | | | | | | | |
| | | | Section | 1 - III | | | | |
| 1. Material This Product Will | Be Packaged In: | | - | | | | | |
| Child-Resistant Packaging | Unit Packaging | | Water So | oluble P | ackaging | 2. 1 | Type of Co | ntainer |
| ☐ Yes | ☐ Yes | | | Yes | | 1 | □ Metal | |
| □ No | □ No | | | No | | | □ Plastic | ; |
| | | T | | | | [| ☐ Glass | |
| * Certification must | If "Yes" Unit Packaging wgt. | No. per container | If "Yes" Package | | No. per container |] | □ Paper | (0) |
| be submitted | | | | | | l | ☐ Other | (Specif <u>y)</u> |
| 3. Location of Net Contents | nformation | 4. Size(s) Ret | tail Contain | er | 5 | | n of Label | Directions |
| ☐ Label ☐ Co | ontainer | | | | | □ On □ On | | accompanying product |
| 6. Manner in Which Label is | Affixed to Product | Lithograph | n | | ☐ Oth | er | | |
| | | ☐ Paper glue | ∌d | | | | | _ |
| | | Stenciled | 0 1' | | | | | |
| 1 Contact Boint (Complete | itama diraatly balay fe | or identification | Section | | o contracted | if noons | ory to pro | acce this application \ |
| 1. Contact Point (Complete | terns directly below it | T T | | uai to D | e contacted, | ii riecess | | ·· / |
| Name Nicole O'Loughlin | | | Title Re | gulator | ry Consulta | ınt | | one No. (Include Area Code) 53-7369 |
| | | Certification | n | | | | | 6. Date Application Received |
| I certify that the statements | | | | | | | | (Stamped) |
| I acknowledge that any know both under applicable law. | vingly false or misleadin | g statement ma | ay be punish | nable by | fine or imprise | onment or | • | (Gtampou) |
| | | | | | | | | 4 |
| 2. Signature | 1 | | 3. Title | aulato | ry Consulta | ınt | | |
| Neide D | sugi | | T(C) | guiatoi | ry Consulta | uit | | |
| • | | | | | | | | |
| 4. Typed Name | | | 5. Date | | | | | |
| Nicole O'Loughlin | Nicole O'Loughlin | | Mar. 30, 2018 | | | | | |

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.



United Phosphorus, Inc.

David L. Olson 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 (610) 491-2814 dave.olson@uniphos.com

April 2, 2010

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as an agent for United Phosphorus, Inc. (EPA Company Number 70506), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

David L. Olson

Director, Regulatory Affairs

cc: Pyxis Regulatory Consulting, Inc.

12 olam



United Phosphorus, Inc.

David L. Olson 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 (610) 491-2814 dave.olson@uniphos.com

January 6, 2017

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as <u>Consultant</u> for United Phosphorus, Inc. (UPI), EPA Company Number 70506, before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 7 U.S.C. § 136 et seq. and state law. <u>This is a change from their previous status as Agent.</u>

If you have any questions, please do not hesitate to contact me.

Sincerely,

David L. Olson

Cc: Pyxis Regulatory Consulting

8/25/2017 Pay.gov - Receipt

Commercial/financial information may be entitled to confidential treatment



Receipt

Your payment is submitted

Pay.gov Tracking ID: 264EN6U5 Agency Tracking ID: 75311871148

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Bank account (ACH)
Payment Amount: \$13,226.00

Transaction Date: 08/25/2017 08:51:25 AM EDT

Payment Date: 08/28/2017 Registration Number: 70506-18

Company Name: United Phosphorus, Inc.

Company Number: 70506

Action Code: R351
Account Information

Account Holder Name: United Phosphorus, Inc.

Account Number: ********2762

Email Confirmation Receipt

Confirmation Receipts have been emailed to:

sherry.hutcheson@uniphos.com wes.daughtry@uniphos.com



4110 136TH ST CT NW GIG HARBOR, WA 98332 T: (253) 853-7369 F: (253) 853-5516 LEANNE@PYXISRC.COM

August 31, 2017

via ELECTRONIC DELIVERY

Elizabeth Fertich (PM 3)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

Transmittal MRID 503635-00

RE: United Phosphorus, Inc. – Bifenthrin Technical Insecticide/Miticide (EPA Reg. No. 70506-18)
Amendment to Add Alternate Source

PRIA Category R351

Dear Ms. Fertich,

On behalf of United Phosphorus, Inc., we are submitting an application to amend the registration of Bifenthrin Technical Insecticide/Miticide to add an unregistered source of active ingredient. In support of this application, we submit the following documents:

- 1. Completed Application for Registration (EPA Form 8570-1)
- 2. Confidential Statement of Formula (EPA Form 8570-4) for Alternate Formulation #1
- 3. Certification with Respect to Citation of Data (EPA Form 8570-34)
- 4. Data Matrix (EPA Form 8570-35) Agency Internal Use and Public File Copies
- 5. Copy of the PRIA payment
- 6. Letter of Authorization
- 7. Product Specific Data:

| MRID | Guideline | Study Title |
|----------|---------------------|------------------------------------------------------------------------|
| 50363501 | 830.1550, 830.1600, | Pruett, P. L. (2017). Product Identity and Composition, Description of |
| | 830.1620, 830.1670, | the Materials Used, Description of the Production Process, Discussion |
| | 830.1750, 830.1800 | of the Formation of Impurities, Certified Limits, and Enforcement |
| | | Analytical Method for Bifenthrin Technical Insecticide/Miticide. |
| 50363502 | 830.1700, 830.1800 | Amruskar, A. (2017). Preliminary Analyses of Five Representative |
| | | Production Batches of Bifenthrin Technical Grade Active Ingredient |
| | | (TGAI) to Determine % Bifenthrin and to Quantify its Associated |
| | | Impurities. |

United Phosphorus, Inc. certifies that this new source qualifies as an alternate to their existing manufacturing document on file with the Agency for this registration. This action falls under Category R351 (57: Amendment adding a new unregistered source of active ingredient). The fee due which has been paid is \$13,226.

We trust you will find this application complete. However, please contact me by email (<u>Leanne@PyxisRC.com</u>) or phone at (253) 853-7369 if you have questions or need additional information

Best Regards,

P. Leanne Pruett

Enclosures

cc: United Phosphorus, Inc.

2/22/2018 Pay.gov - Receipt

Commercial/financial information may be entitled to confidential treatment



Receipt

Your payment is submitted

Pay.gov Tracking ID: 267V6275 Agency Tracking ID: 75429527133

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Bank account (ACH)
Payment Amount: \$13,226.00

Transaction Date: 02/22/2018 01:27:49 PM EST

Payment Date: 02/23/2018 Registration Number: 70506-18

Company Name: UNITED PHOSPHORUS INC

Company Number: 70506 Action Code: R351

Account Information

Account Holder Name: United Phosphorus, Inc.

Account Number: *********2762

Email Confirmation Receipt

Confirmation Receipts have been emailed to:

sherry.hutcheson@uniphos.com wes.daughtry@uniphos.com



4110 136TH ST CT NW GIG HARBOR, WA 98332 T: (253) 853-7369 F: (253) 853-5516 NICOLE@PYXISRC.COM

MRID 505500-00

March 30, 2018

ELECTRONIC SUBMISSION

Kable (Bo) Davis (PM 33)
Document Processing Desk (**REGFEE**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: United Phosphorus, Inc. – Bifenthrin Technical Insecticide/Miticide (EPA Reg. No. 70506-18)
Application to Amend Pesticide Registration

PRIA Category R351

Dear Mr. Davis,

On behalf of United Phosphorus, Inc., please find the enclosed application to amend the registration of Bifenthrin Technical Insecticide/Miticide (EPA Reg. No. 70506-18) to add an unregistered source of active ingredient.

In support of this application, the following documents are enclosed:

- 1. Application for Amended Pesticide Registration (EPA Form 8570-1)
- 2. Receipt of PRIA pre-payment from pay.gov
- 3. Confidential Statement of Formula (EPA Form 8570-4) (Alternate Formulation #2 dated 3/20/2018)
- 4. Certification with Respect to Citation of Data (EPA Form 8570-34)
- 5. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
- 6. Public File Copy of the Data Matrix (EPA Form 8570-35)
- 7. Letter of Authorization from United Phosphorus, Inc.
- 8. Product Specific Data:

| MRID No. | Guideline | Report Title | | | | |
|----------|---------------------|---------------------------------------------------|--|--|--|--|
| 50550001 | 830.1550, 830.1600, | O'Loughlin, N.A. Product Identity and | | | | |
| | 830.1620, 830.1670, | Composition, Description of Starting Materials | | | | |
| | 830.1750, 830.1800 | and Formulation Process, Discussion of the | | | | |
| | | Formation of Impurities, and Certified Limits for | | | | |
| | | Bifenthrin Technical Insecticide/Miticide. | | | | |
| | | [Contains confidential attachment] | | | | |
| 50550002 | 830.1700, 830.1800 | Tomaz, L. Qualitative and Quantitative Profile of | | | | |
| | | the test substance Bifenthrin Technical (Five | | | | |
| | | Batch Analysis). | | | | |
| | | [Contains confidential attachment] | | | | |

United Phosphorus, Inc. certifies that this new source qualifies as an alternate to their existing manufacturing document on file with the Agency for this registration. This action falls under PRIA category R351 (57: Amendment adding a new unregistered source of active ingredient). The fee for this action is \$13,226 and has been paid.

We trust you will find this application complete and in compliance with the requirements for registration under FIFRA. Please feel free to contact me (T) 253-853-7369 or (E) Nicole@PyxisRC.com if you have any questions or need any additional information.

Sincerely,

Nicole O'Loughlin

Neide Jougin

Enclosures

cc: S. Hutcheson; United Phosphorus, Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the complete form

| to this address. | | | | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|
| Certification with | Respect to | Citatio | n of Data | | | | |
| Applicant's/Registrant's Name, Address, and Telephone Number United Phosphorus, Inc.; c/o Pyxis Regulatory Consulting, I St. Ct. NW, Gig Harbor, WA 98332; (253) 853-7369 | nc.; 4110 1 | 36 th | EPA Registration Number/File Symbol 70506-18 | | | | |
| Active Ingredient(s) and/or representative test compound(s) Bifenthrin | | | Date Mar. 30, 2018 | | | | |
| General Use Pattern(s) (list all those claimed for this product using 40 CFF TGAI | R Part 158) | | Product Name Bifenthrin Technical Insecticide/Miticide | | | | |
| NOTE: If your product is a 100% repackaging of another purchased E submit this form. You must submit the Formulator's Exemption Statements | | | | | | | |
| I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offer of compensation (the Data Matrix form should be used for this purpose). | | | | | | | |
| SECTION I: METHOD OF D | ATA SUPPOR | T (Chec | k one method only) | | | | |
| I am using the cite-all method of support, and have included v form a list of companies sent offers of compensation (the Dat form should be used for this purpose). | |) ل | am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used). | | | | |
| SECTION II: 0 | SENERAL OF | ER TO | PAY | | | | |
| [Required if using the cite-all method or when using the cite-all option under | er the selective | method | to satisfy one or more data requirements] | | | | |
| I hereby offer and agree to pay compensation, to other person | ns, with regard | to the a | pproval of this application, to the extent required by FIFRA. | | | | |
| SECTION | N III: CERTIFIC | ATION | | | | | |
| I certify that this application for registration, this form for reregist application for registration, the form for reregistration, or the Data-Call-In reindicated in Section I, this application is supported by all data in the Agenc substantially similar product, or one or more of the ingredients in this product requirements in effect on the date of approval of this application if the application. I certify that for each exclusive use study cited in support of this | esponse. In accy's files that (1 uct; and (2) is a lication sought | dition, if) conce a type of the initia | the cite-all option or cite-all option under the selective method is in the properties or effects of this product or an identical or data that would be required to be submitted under the data all registration of a product of identical or similar composition and | | | | |
| obtained the written permission of the original data submitter to cite that st | | reregist | ration, that i am the original data submitter of that i have | | | | |
| I certify that for each study cited in support of this registration or submitter; (b) I have obtained the permission of the original data submitter compensation have expired for the study; (d) the study is in the public liter offered (I) to pay compensation to the extent required by sections 3(c)(1)(F amount and terms of compensation, if any, to be paid for the use of the study. | to use the sturature; or (e) I h and/or 3(c)(2 | dy in su ave not | oport of this application; (c) all periods of elig bility for ified in writing the company that submitted the study and have | | | | |
| I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA. | | | | | | | |
| | I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | | | | | |
| Signature Meiole Lougin | Date Mar. 30, 2 | 2018 | Typed or Printed Name and Title Nicole O'Loughlin Regulatory Consultant | | | | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

| | DATA MA | ATRIX | | | | | | |
|----------------------------------------|------------------------------------------------------|-------------------------------------------------|-------------------------------------------|----------------------------|---------------------------|--|--|--|
| Date Mar. 30, 2018 | | | EPA Reg. No./File Symbol 70506-1 | Page 1 of 11 | | | | |
| Applicant's / Registrant's Name & | Applicant's / Registrant's Name & Address | | | Product | | | | |
| United Phosphorus, Inc. | | | Bifenthrin Technical Insecticide/Miticide | | | | | |
| 630 Freedom Business Center, Suite 402 | | | | | | | | |
| | King of Prussia, PA 19406 | | | | | | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note | | | |
| 830.1550 | Product Identity and Composition | 45654401, 50363501, 50550001 | United Phosphorus, Inc. | OWN | | | | |
| 830.1600 | Description of Materials Used to Produce the Product | 45654401, 50363501, 50550001 | United Phosphorus, Inc. | OWN | | | | |
| 830.1620 | Description of Production Process | 45654401, 50363501, 50550001 | United Phosphorus, Inc. | | | | | |
| 830.1650 | Description of Formulation Process | | | | Not Required ¹ | | | |
| 830.1670 | Discussion of Formation of Impurities | 45654401, 50363501, 50550001 | United Phosphorus, Inc. | OWN | | | | |
| 830.1700 | Preliminary Analysis | 45654401, 50363501, 50363502, 50550002 | United Phosphorus, Inc. | OWN | | | | |

| Name and Title | Date |
|------------------------------------------|---------------|
| Nicole O'Loughlin, Regulatory Consultant | Mar. 30, 2018 |
| ı | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

| | DATA N | MATRIX | | | |
|-----------------------------------|--------------------------------------------------------------------------|-------------------------------------------------|-------------------------------------------|----------------------------|------|
| Date Mar. 30, 2018 | | | EPA Reg. No./File Symbol 70506-1 | Page 2 of 11 | |
| Applicant's / Registrant's Name & | & Address | | Product | | |
| United Phosphorus, Inc. | | | Bifenthrin Technical Insecticide/Miticide | | |
| | 630 Freedom Business Center, Suite 40 | 2 | | | |
| | King of Prussia, PA 19406 | | | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.1750 | Certified Limits | 45654401, 50363501, 50550001 | United Phosphorus, Inc. | OWN | |
| 830.1800 | Enforcement Analytical Method | 45654401, 50363501, 50363502, 50550002 | United Phosphorus, Inc. | OWN | |
| 830.6302 | Color | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6303 | Physical State | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6304 | Odor | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6313 | Stability to Normal and Elevated Temperatures, Metals, and Metal Ions | 45654403 | United Phosphorus, Inc. | OWN | |
| 830.6314 | Oxidation/Reduction: Chemical Incompatibility | 45838001 | United Phosphorus, Inc | OWN | |
| 830.6315 | Flammability | 45838001 | United Phosphorus, Inc | OWN | |
| 830.6316 | Explodability | 45838001 | United Phosphorus, Inc. | OWN | |

| Name and Title | Date |
|------------------------------------------|---------------|
| Nicole O'Loughlin, Regulatory Consultant | Mar. 30, 2018 |
| | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

| | DA | TA MATRIX | | | | |
|-------------------------------------------|---------------------------------------|------------------------------------|-------------------------------------------|----------------------------|-----------------------------------------------------------|--|
| Date Mar. 30, 2018 | | | EPA Reg. No./File Symbol 70506-1 | Page 3 of 11 | | |
| Applicant's / Registrant's Name & Address | | | Product | | | |
| United Phosphorus, Inc. | | | Bifenthrin Technical Insecticide/Miticide | | | |
| | 630 Freedom Business Center, Suite | e 402 | | | | |
| | King of Prussia, PA 19406 | | | | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note | |
| 830.6317 | Storage Stability | 45654403, 46414201 | United Phosphorus, Inc. | OWN | | |
| 830.6319 | Miscibility | | | | Not Required ² | |
| 830.6320 | Corrosion Characteristics | 46414201 | United Phosphorus, Inc. | OWN | | |
| 830.6321 | Dielectric Breakdown Voltage | | | | Not Required ² | |
| 830.7000 | рН | 45838001 | United Phosphorus, Inc. | OWN | | |
| 830.7050 | UV/Visible Absorption | CITE ALL | | PAY | See list of companies in 'Generic Data' section of Matrix | |
| 830.7100 | Viscosity | | | | Not Required ² | |
| 830.7200 | Melting Point/Melting Range | 45838001 | United Phosphorus, Inc. | OWN | | |
| 830.7220 | Boiling Point/Boiling Range | 45838001 | United Phosphorus, Inc. | OWN | | |
| 830.7300 | Density/Relative Density/Bulk Density | 45838001, 46008501, 46008502 | United Phosphorus, Inc. | OWN | | |
| 830.7370 | Dissociation Constants in Water | 45838001 | United Phosphorus, Inc., | OWN | | |

Weish Jougin

Signature

Date

Mar. 30, 2018

Name and Title

Nicole O'Loughlin, Regulatory Consultant

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

| | DATA N | IATRIX | | | |
|-----------------------------------|------------------------------------------------------------------------------|-------------|---------------------------------|----------------------------|--------------------------------------------------------------------|
| Date Mar. 30, 2018 | | | EPA Reg. No./File Symbol 70506- | Page 4 of 11 | |
| Applicant's / Registrant's Name & | & Address | | Product | | |
| United Phosphorus, Inc. | | | Bifenthrin Technical Insectici | | |
| | 630 Freedom Business Center, Suite 40 | 2 | | | |
| | King of Prussia, PA 19406 | | | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.7520 | Particle size, fiber length, diameter distribution | | | | Not Required ² |
| 830.7550 | Partition Coefficient (n-octanol/water), Shake Flask Method | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| 830.7560 | Partition Coefficient (n-octanol/water), Generator Column Method | | | | See 830.7550 |
| 830.7570 | Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography | | | | See 830.7550 |
| 830.7840 | Water Solubility: Column Elution Method; Shake Flask Method | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| 830.7860 | Water Solubility, Generator Column Method | | | | See 830.7840 |
| 830.7950 | Vapor Pressure | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| 870.1100 (81-1) | Acute Oral Toxicity: Rat | 45654404 | United Phosphorus, Inc. | OWN | |
| Signature | | | Name and Title | | Date |
| M | ich Dough | | Nicole O'Loughlin, Regulator | ry Consultant | Mar. 30, 2018 |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

| send the form to this address. | | | | | |
|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|------------------------------------------|-----------|----------------------------|
| | DATA MA | ATRIX | | | |
| Date Mar. 30, 2018 | | | EPA Reg. No./File Symbol 70506-18 | | Page 5 of 11 |
| Applicant's / Registrant's Name 8 | & Address | | Product | | |
| | United Phosphorus, Inc. | | Bifenthrin Technical Insecticide/ | Miticide | |
| | 630 Freedom Business Center, Suite 402 | | | | |
| | King of Prussia, PA 19406 | | | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 870.1200 (81-2) | Acute Dermal Toxicity: Rat | 45654405 | United Phosphorus, Inc. | OWN | |
| 870.1300 (81-3) | Acute Inhalation Toxicity: Rat | 00155286 | FMC Corporation | OLD | |
| 870.2400 (81-4) | Primary Eye Irritation: Rabbit | 00132522 | FMC Corporation | OLD | |
| 870.2500 (81-5) | Primary Dermal Irritation | 00132521 | FMC Corporation | OLD | |
| 870.2600 (81-6) | Dermal Sensitization | 00132523 | FMC Corporation | OLD | |
| | | | | | |
| Product Specific and G | eneric Data Requirements | | | | |
| requirements for bifenthr | (UPI) is using the cite-all option to satisfy generic data rin (128825). UPI has made offers-to-pay to the following 2018 Data Submitters List for bifenthrin. | | | | |
| | | Cite-All | Syngenta Crop Protctn, Greensboro NC | PAY | |
| | | Cite-All | Nufarm Americas, Inc., Morrisville, NC | PAY | |
| | | Cite-All | The Scotts Co. dba Ortho, Marysville, OH | PAY | |
| | | Cite-All | Bayer Cropscience LP; RTP, NC | PAY | |
| | | Cite-All | FMC Corp.; Philadelphia, PA | PAY | |
| | | • | T | • | · I |
| Signature | 0.4 | | Name and Title | _ | Date |
| 2/1 | ide Dougi | | Nicole O'Loughlin, Regulatory C | onsultant | Mar. 30, 2018 |
| 190 | and Gloude | | | | |

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| | | DATA MATRIX | | | |
|-----------------------------------|----------------------------|---------------|---------------------------------------------------------|------------|----------------------------|
| | | DATAMATRIA | 1 | | 1 |
| Date Mar. 30, 2018 | | | EPA Reg. No./File Symbol 70506-18 | | Page 6 of 11 |
| Applicant's / Registrant's Name & | | | Product | | |
| | United Phosphorus, Inc. | | Bifenthrin Technical Insecticide/ | Miticide (| |
| | 630 Freedom Business Cente | er, Suite 402 | | | |
| | King of Prussia, PA 19406 | | | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | Cite-All | Bayer Env. Science; RTP, NC | PAY | |
| | | Cite-All | BASF Corp, RTP, NC | PAY | |
| | | Cite-All | The Scotts Co., Marysville, OH | PAY | |
| | | Cite-All | Lebanon Seaboard Corp., Lebanon, PA | PAY | |
| | | Cite-All | McLaughlin Gormley King Co, dba MGK, Minneapolis, MN | PAY | |
| | | Cite-All | Fuller Systems, Inc., Woburn, MA | PAY | |
| | | Cite-All | Winfield Solutions, LLC, St. Paul, MN | PAY | |
| | | Cite-All | Sergeant's Pet Care Prd's, Omaha, NE | PAY | |
| | | Cite-All | Aceto Ag. Chemicals Corp., Port Washington, NY | PAY | |
| | | Cite-All | S. C. Johnson & Son, Inc., Racine, WI | PAY | |
| | | Cite-All | Amvac Chm Corp., Newport Beach, CA | PAY | |
| | | Cite-All | Helena Chemical Co., Memphis, TN | PAY | |
| | | Cite-All | Southern States Co-op., Inc, Salem, VA | PAY | |
| | | Cite-All | Nippon Soda Co., Ltd., New York, NY | PAY | |
| Signature | | <u> </u> | Name and Title | | Date |
| M | ich Lougi | | Nicole O'Loughlin, Regulatory C | Consultant | Mar. 30, 2018 |

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| send the form to this address. | | | | | |
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| | | DATA MATRIX | | | |
| Date Mar. 30, 2018 | | EPA Reg. No./File Symbol 70506-18 | | Page 7 of 11 | |
| Applicant's / Registrant's Name & | Applicant's / Registrant's Name & Address | | Product | | |
| | United Phosphorus, Inc. | | Bifenthrin Technical Insecticide/ | Miticide | |
| | 630 Freedom Business C | enter, Suite 402 | | | |
| | King of Prussia, PA 1940 | 6 | | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | Cite-All | The Andersons, Inc., Maumee, OH | PAY | |
| | | Cite-All | Sunniland Corp., Sanford, FL | PAY | |
| | | Cite-All | Chemsico, St. Louis, MO | PAY | |
| | | Cite-All | Lesco, Inc., Cleveland, OH | PAY | |
| | | Cite-All | ADAMA Makhteshim Ltd, c.o. Makhteshim Agan of NA, Raleigh, NC | PAY | |
| | | Cite-All | Loveland Products, Inc., Greeley, CO | PAY | |
| | | Cite-All | Howard Fertilizer & Chm. Co., Salem, VA | PAY | |
| | | Cite-All | Albaugh, LLC, Valdosta, GA | PAY | |
| | | Cite-All | BASF Sparks, LLC, RTP, NC | PAY | |
| | | Cite-All | Control Solutions, Inc., Pasadena, TX | PAY | |
| | | Cite-All | Arizona Chm Grp, c/o Pyxis Regulatory Consulting, Gig Harbor, WA | PAY | |
| | | Cite-All | Valent USA LLC, Walnut Creek, CA | PAY | |
| | | Cite-All | Pyrethroid Working Grp, c/o Landis, Valdosta, GA | PAY | |
| Signature | | | Name and Title | | Date |
| Vfe | ide Dougi | | Nicole O'Loughlin, Regulatory C | onsultant | Mar. 30, 2018 |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

| cond the ferm to the dual coe. | | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------------------------------------|----------------------------------------------|--------------------|----------------------------|
| | DATA MA | ATRIX | | | |
| Date Mar. 30, 2018 | | | EPA Reg. No./File Symbol 70506-18 | | Page 8 of 11 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | Product Bifenthrin Technical Insecticide/Miticide | | | |
| Ingredient Bifenthrin (CAS N | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | Cite-All | Makhteshim Agan of NA, Raleigh, NC | PAY | |
| | | Cite-All | Arysta Lifescience NA, Cary, NC | PAY | |
| | | Cite-All | Spray Drift TF, Washington, DC | OWN | |
| | | Cite-All | Bengal Products, Inc., Baton Rouge, LA | PAY | |
| | | Cite-All | Outdoor Res Exp TF, Washington DC | OWN | |
| | | Cite-All | Ag Reentry TF, Washington, DC | OWN | |
| | | Cite-All | Sapstain Industry Group, Titusville, NJ | PAY | |
| | | Cite-All | Non-Dietary Exp TF, Washington, DC | PAY | |
| | | Cite-All | Nisso LLC, New York, NY | PAY | |
| | | Cite-All | Univar Env. Sciences, Brookfield, CT | PAY | |
| | | Cite-All | FIFRA Engangered Species TF, Lakewood, WA | PAY | |
| | | Cite-All | Residential Exposure JV, Washington, DC | PAY | |
| | | Cite-All | Atex, Inc. c/o Landis, Valdosta, GA | PAY | |
| | | | | | Т |
| Signature Signature | | Name and Title Nicole O'Loughlin, Regulatory Consultant | | Date Mar. 30, 2018 | |
| Vife | ibe Dougi | | 3 , 131 1331, | | , |

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| | DA | ATA MATRIX | | | |
|-----------------------------------|----------------------------------|-------------|-------------------------------------------------------------|-----------|----------------------------|
| Date Mar. 30, 2018 | | | EPA Reg. No./File Symbol 70506-18 | | Page 9 of 11 |
| Applicant's / Registrant's Name 8 | & Address | | Product | | |
| | United Phosphorus, Inc. | | Bifenthrin Technical Insecticide/l | Miticide | |
| | 630 Freedom Business Center, Sui | ite 402 | | | |
| | King of Prussia, PA 19406 | | | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | Cite-All | Ag Handler Exposure TF, Macon, MO | OWN | |
| | | Cite-All | Osmose Utilities Svcs, Inc, P'tree City GA | PAY | |
| | | Cite-All | Ensystex II, c/o Pyxis, Gig Harbor, WA | PAY | |
| | | Cite-All | Sharda Cropchem Ltd., c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Winfield Solutions, LLC, St. Paul, MN | PAY | |
| | | Cite-All | Tacoma Ag.,c/o Pyxis, Gig Harbor, WA | PAY | |
| | | Cite-All | Sharda USA LLC, c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Ensystex IV, c/o Pyxis, Gig Harbor, WA | PAY | |
| | | Cite-All | Ragan and Massey, Inc, c/o Pyxis, Gig Harbor, WA | PAY | |
| | | Cite-All | Wet & Forget USA Ltd, c/o Lewis & Harrison, Washington, DC | PAY | |
| | | Cite-All | Generic Endangered Species TF, c/o Pyxis, Gig Harbor, WA | OWN | |
| | | Cite-All | Kaizen Technologies, Johnston, CO | PAY | |
| Signature | | | Name and Title | | Date |
| = | ich Dougin | | Nicole O'Loughlin, Regulatory C | onsultant | Mar. 30, 201 |

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| seria trie form to triis address. | | | | | |
|-----------------------------------|----------------------------------------|-------------|------------------------------------------------------------------|----------|-----------------------------|
| | DATA N | IATRIX | | | |
| Date Mar. 30, 2018 | | | EPA Reg. No./File Symbol 70506-18 | | Page 10 of 11 |
| Applicant's / Registrant's Name & | Address | | Product | | |
| | United Phosphorus, Inc. | | Bifenthrin Technical Insecticide/ | Miticide | |
| | 630 Freedom Business Center, Suite 402 | 2 | | | |
| | King of Prussia, PA 19406 | | | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | 1 | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | Cite-All | Bifenthrin TF, c/o CSPA, Washington, DC | OWN | |
| | | Cite-All | Solutions Pest & Lawn, c/o Biologic Brookfield, CT | PAY | |
| | | Cite-All | Vive Crop Prot. Inc., c/o OMC AG Consulting, East Lansing, MI | PAY | |
| | | Cite-All | Liberty Crop Protection, Loveland, CO | PAY | |
| | | Cite-All | Prime Source c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Genmerica NA, c/o GHB, LeMars, IA | PAY | |
| | | Cite-All | Tevra Brands, LLC, Omaha, NE | PAY | |

| | _ | |
|-------------|------------------------------------------|---------------|
| Signature | Name and Title | Date |
| Neide Lougi | Nicole O'Loughlin, Regulatory Consultant | Mar. 30, 2018 |

Endnotes for Data Matrix for Bifenthrin Technical Insecticide/Miticide Mar. 30, 2018

¹ 830.1650 – per OSCPP 830.1000 guidelines, these data are not required for the registration of a technical grade active ingredient. See 830.1620 for production process information.

² 830.6319, 830.6321, 830.7100, 830.7520 - Per OSCPP 830.1000 guidelines, these data are not required for the registration of a technical grade active ingredient. Additionally, this product is not a liquid, is not a fibrous material, and is not used around electrical equipment

| Please read instructions on reverse be | fore completing form. | EXPEDITE | Form Appro | ved, OMB No. 20 | 70-0060, Approval expires 05-31-98 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|----------------------|----------------------|------------------------|------------------------------------|
| | United State | es | ☐ Registra | ation | OPP Identifier Number |
| EPA En | vironmental Prote | ction Agenc | y 🛛 Amendr | nent | |
| | Washington, DC | 20460 | ☐ Other: | | |
| | Applio | ation for Pe | esticide - Section | n I | |
| Company/Product Number | | | Product Manager | | Proposed Classification |
| United Phosphorous, Inc./70 | 506-18 | • | Ondish | | None Restricted |
| Company/Product (Name) BIFENTHRIN TECHNICAL II | NSECTICIDE/MITIC | PM# | | | None Restricted |
| 5. Name and Address of Applicant | | | edited Review. In | accordance v | with FIFRA Section 3(c)(3) |
| United Phosphorus, Inc. | . 0 | (b)(l), i | my product is simila | ar or identical | in composition and labeling |
| 630 Freedom Business Cer King of Prussia, PA 19406 | iter, Ste. 402 | to: | Nam Na | | |
| King of Frussia, FA 19400 | | EPAR | Reg. No | | |
| Check if this is a new a | address | Produc | ct Name | | |
| | | Secti | on - II | | |
| Amendment – Explain below. | | | Final printed lat | els in response t | o Agency letter dated |
| Resubmission in response to | Agency letter dated | _ | Me Too" Applic | ation | |
| Notification - Explain below. | | <u> </u> | Other - Explain | | |
| Explanation: Use additiona | al page(s) if necessa | ry. (For Sect | ion I and Section II | .) | |
| This submission is being ma | ade to amend the lab | el for BIFEN | THRIN TECHNIC | AL INSECTI | CIDE/MITICIDE (EPA Reg. |
| No. 70506-18) to expand th | | | | | |
| instructions for fiber drum of | container. Please see | the cover let | ter for additional d | etails. | - |
| | | | | | |
| | | Section | on - III | | |
| Material This Product Will Be P. Child-Resistant Packaging | ackaged In: Unit Packaging | | Water Soluble Pac | kaging | Type of Container |
| Yes* | Yes | | Yes | Kagirig | Metal |
| ☐ No | ☐ No | | ☐ No | | Plastic |
| | If "Yes" | No. per container | If "Yes" | No. per | Glass |
| *Certification must | Unit Packaging wgt | . Container | Package wgt. | container | Paper |
| be submitted | antina A Cina | (a) Datail Cantai | | | Other (Specify) |
| 3. Location of Net Contents Inform Label Cor | nation 4. Size | e(s) Retail Contain | ner | 5. Location of On Labe | of Label Directions |
| | italilei | | | | ling accompanying product |
| 6. Manner in Which Label is Affixed | d to Product Lit | hograph | Other | | |
| | | per glued | | | |
| | <u> </u> | enciled Section | on - IV | | |
| Contact Point (Complete items of the contac | directly below for identifica | | | essary, to process | s this application) |
| Name | | Title | | , | Telephone No. (Include Area |
| Crystal Layton | | Regulatory | y Manager | | Code) 229-583-3006 |
| | Certifica | | | | 6. Date Application |
| I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. Received I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both (Stam | | | | | Received (Stamped) |
| under applicable law. | 2 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 | | | | (Otampea) |
| 2. Signature | | 3. Title | , Managar | | |
| (Sout | \sim | Regulatory | y iviaitayei | | |
| 4. Tuned Name | | E Data | | | |
| Typed Name Crystal Layton | | 5. Date 11/28/18 | | | |
| 2. , 2 | | 25, 10 | | | |

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete

White- EPA File Copy (original) Yellow- Applicant Copy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

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| Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Aven to this address. | ue, N.W., Washingtor | n, DC 20460. Do not send the completed form | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|
| Certification with Respect to Citation of Data | | | | | | |
| Applicant's/Registrant's Name, Address, and Telephone Number 229-583-3006 United Phosphorus, Inc., 630 Freedom Business Center, Suite 402, King of Prussia | ı, PA 19406 | EPA Registration Number/File Symbol 70506-18 | | | | |
| Active Ingredient(s) and/or representative test compound(s) Bifenthrin | | Date 11/28/2018 | | | | |
| General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) TGAI | | Product Name Bifenthrin Technical Insecticide/Miticide | | | | |
| NOTE: If your product is a 100% repackaging of another purchased EPA-registere submit this form. You must submit the Formulator's Exemption Statement (EPA Form | | r all the same uses on your label, you do not need to | | | | |
| I am responding to a Data-Call-In Notice, and have included with this form a leader to be used for this purpose). | ist of companies se | nt offers of compensation (the Data Matrix form should | | | | |
| SECTION I: METHOD OF DATA SUPP | ORT (Check one me | ethod only) | | | | |
| I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose). | under the | the selective method of support (or cite-all option selective method), and have included with this form a I list of data requirements (the Data Matrix form must be | | | | |
| SECTION II: GENERAL O | OFFER TO PAY | | | | | |
| [Required if using the cite-all method or when using the cite-all option under the select | ive method to satisf | y one or more data requirements] | | | | |
| I hereby offer and agree to pay compensation, to other persons, with regard to | the approval of this | application, to the extent required by FIFRA. | | | | |
| SECTION III: CERTI | FICATION | | | | | |
| I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses . | | | | | | |
| I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study. | or reregistration, tha | at I am the original data submitter or that I have obtained | | | | |
| I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study. | | | | | | |
| I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA. | | | | | | |
| I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | | | | | |
| Signature Cauton | Date 11/28/2018 | Typed or Printed Name and Title Crystal Layton, Regulatory Manager | | | | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Form Approved OMB No. 2070-0060

401 M Street, S.W. WASHINGTON, D.C. 20460

| DATA MATRIX | | | | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------|----------------------|--|---------------------------------------------------|-----------------------------------|--------|----------------------------|--|
| Date November 28, 2018 | | | | EPA Reg. No./File Symbol 70506-18 | | Page 1 of 13 | |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | | Product Bifenthrin Technical Insecticide/Miticide | | | | |
| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | | | |
| Guideline Reference Number | Guideline Study Name | | MRID Number | Submitter | Status | Note | |

| Product Chemistry Series A | | | | | |
|----------------------------|------------------------------------------------------|------------------------------------|-------------------------|-----|---------------------------|
| 830.1550 | Product Identity and Composition | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |
| 830.1600 | Description of Materials Used to Produce the Product | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |
| 830.1620 | Description of Production Process | 45654401, 50363501 | United Phosphorus, Inc. | | |
| 830.1650 | Description of Formulation Process | | | | Not Required ¹ |
| 830.1670 | Discussion of Formation of Impurities | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |
| 830.1700 | Preliminary Analysis | 45654401, 50363501, 50363502 | United Phosphorus, Inc. | OWN | |
| 830.1750 | Certified Limits | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |

| Signature | | Name and Title | Date |
|-----------|--------|------------------------------------|----------|
| | dayton | Crystal Layton, Regulatory Manager | 11/28/18 |

Form Approved OMB No. 2070-0060

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| | DATA | MATRIX | | | |
|-------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|------------------------------------|--------------------------------------------------|--------|--------------|
| Date November 28, 2018 | | | EPA Reg. No./File Symbol 70506-18 | | Page 2 of 13 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | 02 | Product Bifenthrin Technical Insecticide/Miticid | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.1800 | Enforcement Analytical Method | 45654401, 50363501, 50363502 | United Phosphorus, Inc. | OWN | |
| Product Chemistry Ser | ies B | | | | |
| 830.6302 | Color | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6303 | Physical State | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6304 | Odor | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6313 | Stability to Normal and Elevated Temperatures, Metals, and Metal Ions | 45654403 | United Phosphorus, Inc. | OWN | |
| 830.6314 | Oxidation/Reduction: Chemical Incompatibility | 45838001 | United Phosphorus, Inc | OWN | |
| 830.6315 | Flammability | 45838001 | United Phosphorus, Inc | OWN | |
| 830.6316 | Explodability | 45838001 | United Phosphorus, Inc. | OWN | |

| Signature | | Name and Title | Date |
|-----------|--------|------------------------------------|----------|
| | Cauton | Crystal Layton, Regulatory Manager | 11/28/18 |

Form Approved OMB No. 2070-0060

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| | DATA | MATRIX | | | |
|-------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-----------------------|----------------------------------------|--------------------|--------------------------------------------------------------------|
| Date November 28, 2018 | | | EPA Reg. No./File Symbol 70506-1 | 18 | Page 3 of 13 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | 102 | Product Bifenthrin Technical Insectici | secticide/Miticide | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.6317 | Storage Stability | 45654403, 46414201 | United Phosphorus, Inc. | OWN | |
| 830.6319 | Miscibility | | | | Not Required ² |
| 830.6320 | Corrosion Characteristics | 46414201 | United Phosphorus, Inc. | OWN | |
| 830.6321 | Dielectric Breakdown Voltage | | | | Not Required ² |
| 830.7000 | рН | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.7050 | UV/Visible Absorption | CITE ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| 830.7100 | Viscosity | | | | Not Required ² |
| 830.7200 | Melting Point/Melting Range | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.7220 | Boiling Point/Boiling Range | 45838001 | United Phosphorus, Inc. | OWN | |

| Signature | | Name and Title | Date |
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| | (Sauton | Crystal Layton, Regulatory Manager | 11/28/18 |

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| | DATA MA | ATRIX | | | |
|-------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|------------------------------------|---------------------------------------------------|--------|-----------------------------------------------------------------|
| Date November 28, 2018 | | | EPA Reg. No./File Symbol 70506-18 | | Page 4 of 13 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | | Product Bifenthrin Technical Insecticide/Miticide | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.7300 | Density/Relative Density/Bulk Density | 45838001, 46008501, 46008502 | United Phosphorus, Inc. | OWN | |
| 830.7370 | Dissociation Constants in Water | 45838001 | United Phosphorus, Inc., | OWN | |
| 830.7520 | Particle size, fiber length, diameter distribution | | | | Not Required ² |
| 830.7550 | Partition Coefficient (n-octanol/water), Shake Flask Method | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| 830.7560 | Partition Coefficient (n-octanol/water), Generator Column Method | | | | See 830.7550 |
| 830.7570 | Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography | | | | See 830.7550 |
| 830.7840 | Water Solubility: Column Elution Method; Shake Flask Method | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| 830.7860 | Water Solubility, Generator Column Method | | | | See 830.7840 |

| Signature | | Name and Title | Date |
|-----------|--------|------------------------------------|----------|
| | dayton | Crystal Layton, Regulatory Manager | 11/28/18 |

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| | | DAT | TA MATRIX | | | |
|-------------------------------------------------------------------------------------------------------------------------------------|--------------------|------------------|---------------------------------------------------|-----------------------------------|--------|-----------------------------------------------------------|
| Date November 28, 2018 | | | | EPA Reg. No./File Symbol 70506-18 | | Page 5 of 13 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | 402 | Product Bifenthrin Technical Insecticide/Miticide | | | |
| Ingredient Bifenthrin (CAS | | <u> </u> | | | | |
| Guideline Reference Number | Guideline Study Na | ame | MRID Number | Submitter | Status | Note |
| 830.7950 | Vapor Pressu | е | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| | Acute T | oxicity | | | | |
| 870.1100 (81-1) | Acute Oral To | xicity: Rat | 45654404 | United Phosphorus, Inc. | OWN | |
| 870.1200 (81-2) | Acute Dermal | Toxicity: Rat | 45654405 | United Phosphorus, Inc. | OWN | |
| 870.1300 (81-3) | Acute Inhalation | on Toxicity: Rat | 00155286 | FMC Corporation | OLD | |
| 870.2400 (81-4) | Primary Eye II | ritation: Rabbit | 00132522 | FMC Corporation | OLD | |
| 870.2500 (81-5) | Primary Derm | al Irritation | 00132521 | FMC Corporation | OLD | |
| 870.2600 (81-6) | Dermal Sensit | ization | 00132523 | FMC Corporation | OLD | |

| Signature | $\bigcirc\bigcirc$ | Name and Title | Date |
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| DATA MATRIX | | | | | | | |
|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|----------|---------------------------------------------------|-----------------------------------|--------|----------------------------|--|
| Date November 28, 2018 | | | | EPA Reg. No./File Symbol 70506-18 | | Page 6 of 13 | |
| Applicant's / Registrant's Name & / | Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | Product Bifenthrin Technical Insecticide/Miticide | | | | |
| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | | | |
| Guideline Reference Number | Guideline Stu | udy Name | MRID Number | Submitter | Status | Note | |

| Generic Data Requirements | | Cite-All | Syngenta Crop Protctn, Greensboro NC | PAY | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|----------|---------------------------------------------------------|------|----------|
| United Phosphorus, Inc. (UPI) is using the cite-all option to satisfy generic data requirements for bifenthrin (PC 128825). UPI will make offers to pay to the | | | Nufarm Americas, Inc., Morrisville, NC | PAY | |
| | e 10/1/2018 Pesticide Data Submitter's List for | Cite-All | The Scotts Co. dba Ortho, Marysville, OH | PAY | |
| | Dienami. | | Bayer Cropscience LP; RTP, NC | PAY | |
| | | Cite-All | FMC Corp.; Philadelphia, PA | PAY | |
| | | Cite-All | Bayer Env. Science; RTP, NC | PAY | |
| | | Cite-All | BASF Corp, RTP, NC | PAY | |
| | | Cite-All | The Scotts Co., Marysville, OH | PAY | |
| | | Cite-All | Lebanon Seaboard Corp., Lebanon, PA | PAY | |
| | | Cite-All | McLaughlin Gormley King Co, dba MGK, Minneapolis, MN | PAY | |
| Signature Cauton | | • | Name and Title | | Date |
| | | | Crystal Layton, Regulatory Mana | ager | 11/28/18 |

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| | | DATA MATRIX | | | |
|-------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------------|---------------------------------------------------|--------|----------------------------|
| Date November 28, 2018 | | | EPA Reg. No./File Symbol 70506-18 | | Page 7 of 13 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | Suite 402 | Product Bifenthrin Technical Insecticide/Miticide | | |
| Ingredient Bifenthrin (CAS N | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | 1 | • | | | |
| | | Cite-All | Fuller Systems, Inc., Woburn, MA | PAY | |
| | | Cite-All | Winfield Solutions, LLC, St. Paul, MN | PAY | |
| | | Cite-All | Sergeant's Pet Care Prd's, Omaha, NE | PAY | |
| | | Cite-All | Aceto Ag. Chemicals Corp., Port Washington, NY | PAY | |
| | | Cite-All | S. C. Johnson & Son, Inc., Racine, WI | PAY | |
| | | Cite-All | Amvac Chm Corp., Newport Beach, CA | PAY | |
| | | Cite-All | Helena Chemical Co., Memphis, TN | PAY | |
| | | Cite-All | Southern States Co-op., Inc, Salem, VA | PAY | |
| | | Cite-All | Nippon Soda Co., Ltd., New York, NY | PAY | |
| | | | | | |
| Signature | | | Name and Title | | Date |
| Sauto | | | Crystal Layton, Regulatory Mana | ager | 11/28/18 |

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| | DATA | MATRIX | | | |
|-------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------------|---------------------------------------------------------------------|--------|----------------------------|
| Date November 28, 2018 | | | EPA Reg. No./File Symbol 70506-18 | | Page 8 of 13 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | 02 | Product Bifenthrin Technical Insecticide/Miticide | | |
| Ingredient Bifenthrin (CAS N | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | | | | |
| | | Cite-All | The Andersons, Inc., Maumee, OH | PAY | |
| | | Cite-All | Sunniland Corp., Sanford, FL | PAY | |
| | | Cite-All | Chemsico, St. Louis, MO | PAY | |
| | | Cite-All | Lesco, Inc., Cleveland, OH | PAY | |
| | | Cite-All | ADAMA Makhteshim Ltd, c.o. Makhteshim Agan of NA, Raleigh, NC | PAY | |
| | | Cite-All | Loveland Products, Inc., Greeley, | PAY | |
| | | Cite-All | Howard Fertilizer & Chm. Co., Salem, VA | PAY | |
| | | Cite-All | Albaugh, LLC, Valdosta, GA | PAY | |
| | | Cite-All | BASF Sparks, LLC, RTP, NC | PAY | |
| | | 4 | | ' | • |
| Signature | | | Name and Title | | Date |
| Cauton | | | Crystal Layton, Regulatory Mana | ager | 11/28/18 |

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| Date November 28, 2018 | | EPA Reg. No./File Symbol 70506-18 | | Page 9 of 13 | |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | | Product Bifenthrin Technical Insecticide/Miticide | | |
| Ingredient Bifenthrin (CAS N | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | | 1 | ı | |
| | | Cite-All | Control Solutions, Inc., Pasadena, TX | PAY | |
| | | Cite-All | Arizona Chm Grp, c/o Pyxis Regulatory Consulting, Gig Harbor, WA | PAY | |
| | | Cite-All | Valent USA LLC, Walnut Creek, CA | PAY | |
| | | Cite-All | Pyrethroid Working Grp, c/o Landis, Valdosta, GA | PAY | |
| | | Cite-All | Makhteshim Agan of NA, Raleigh, NC | PAY | |
| | | Cite-All | Arysta Lifescience NA, Cary, NC | PAY | |
| | | Cite-All | Spray Drift TF, Washington, DC | OWN | |
| | | Cite-All | Bengal Products, Inc., Baton Rouge, LA | PAY | |
| | | | | | |
| Signature | | | Name and Title | | Date |
| Colayton | | | Crystal Layton, Regulatory Manager | | 11/28/18 |

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| Applicant's / Registrant's Name & | | 630 Freedom Business Center, Suite 402 | | Product Bifenthrin Technical Insecticide/Miticide | |
| Ingredient Bifenthrin (CAS N | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | | | | |
| | | Cite-All | Outdoor Res Exp TF, Washington DC | OWN | |
| | | Cite-All | Ag Reentry TF, Washington, DC | OWN | |
| | | Cite-All | Sapstain Industry Group, Titusville, NJ | PAY | |
| | | Cite-All | Non-Dietary Exp TF, Washington, DC | PAY | |
| | | Cite-All | Nisso LLC, New York, NY | PAY | |
| | | Cite-All | Univar Env. Sciences, Brookfield, CT | PAY | |
| | | Cite-All | FIFRA Engangered Species TF, Lakewood, WA | PAY | |
| | | Cite-All | Residential Exposure JV, Washington, DC | PAY | |
| | | Cite-All | Atex, Inc. c/o Landis, Valdosta, GA | PAY | |
| | | | | | |
| Signature | | | Name and Title | | Date |
| Colayton | | | Crystal Layton, Regulatory Mana | ager | 11/28/18 |

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| Date November 28, 2018 | | | | EPA Reg. No./File Symbol 70506-18 | | Page 11 of 13 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | e 402 | Product Bifenthrin Technical Insecticide/Miticide | | , , | |
| ngredient Bifenthrin (CAS | No. 82657-0 | 04-3) | | | | |
| Guideline Reference Number | Guideline St | udy Name | MRID Number | Submitter | Status | Note |
| | | | Cite-All | Ag Handler Exposure TF, Macon, MO | PAY | |
| | | | Cite-All | Osmose Utilities Svcs, Inc, P'tree City GA | PAY | |
| | | | Cite-All | Ensystex II, c/o Pyxis, Gig Harbor, WA | PAY | |
| | | | Cite-All | Sharda Cropchem Ltd., c/o Wagner, Hockessin, DE | PAY | |
| | | | Cite-All | Winfield Solutions, LLC, St. Paul, MN | PAY | |
| | | | Cite-All | Tacoma Ag.,c/o Pyxis, Gig Harbor, WA | PAY | |
| | | | Cite-All | Sharda USA LLC, c/o Wagner, Hockessin, DE | PAY | |
| | | | Cite-All | Ensystex IV, c/o Pyxis, Gig Harbor, WA | PAY | |
| | | | Cite-All | Wet & Forget USA Ltd, c/o Lewis & Harrison, Washington, DC | PAY | |
| Signature | | • | Name and Title | | Date | |
| Calayton | | | | Crystal Layton, Regulatory Mana | ager | 11/28/18 |

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| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | | Product Bifenthrin Technical Insecticide/Miticide | | |
| Ingredient Bifenthrin (CAS | No. 82657-04-3) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | Cite-All | Ragan and Massey, Inc. c/o Pyxis, Gig Harbor, WA | | |
| | | Cite-All | Generic Endangered Species TF, c/o Pyxis, Gig Harbor, WA | OWN | |
| | | Cite-All | Kaizen Technologies, Johnston, CO | PAY | |
| | | Cite-All | Bifenthrin TF, c/o CSPA, Washington, DC | OWN | |
| | | Cite-All | Vive Crop Prot. Inc., c/o OMC AG Consulting, East Lansing, MI | PAY | |
| | | Cite-All | Liberty Crop Protection, Loveland, CO | PAY | |
| | | Cite-All | Prime Source c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Atticus, LLC. , c/o Pyxis, Gig Harbor, WA | PAY | |
| | | | • | | |
| Signature | | | Name and Title | | Date |
| Cauton | | | Crystal Layton, Regulatory Mana | ager | 11/28/18 |

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| Date November 28, 2018 | | | | EPA Reg. No./File Symbol 70506-18 | | Page 13 of 13 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | | Product Bifenthrin Technical Insecticide/Miticide | | | |
| Ingredient Bifenthrin (CAS | No. 82657- | | | | | |
| Guideline Reference Number | Guideline S | tudy Name | MRID Number | Submitter | Status | Note |
| | | | Cite-All | Genmerica NA, c/o GHB, LeMars, IA | PAY | |
| | | | Cite-All | Tevra Brands, LLC, Omaha, NE | PAY | |

Endnotes for Data Matrix for Bifenthrin Technical Insecticide/Miticide November 28, 2018

- 1. 830.1650 per OSCPP 830.1000 guidelines, these data are not required for the registration of a technical grade active ingredient. See 830.1620 for production process information.
- 2. 830.6319, 830.6321, 830.7100, 830.7520 Per OSCPP 830.1000 guidelines, these data are not required for the registration of a technical grade active ingredient. Additionally, this product is not a liquid, is not a fibrous material, and is not used around electrical equipment.

| Signature | Name and Title | Date |
|-----------|------------------------------------|----------|
| dayton | Crystal Layton, Regulatory Manager | 11/28/18 |
| 0 | | |

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Crystal Layton 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Phone: (229) 583-3006

November 28, 2018

VIA CDX

Mindy Ondish, Acting PM 3 Registration Division, IVB1 Document Processing Desk (AMEND) US Environmental Protection Agency Office of Pesticide Programs (7505P) One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202 **2**703-605-0723

Subject: Label Amendment for BIFENTHRIN TECHNICAL INSECTICIDE/MITICIDE (EPA Reg. No. 70506-18)

Dear Ms. Ondish,

This submission is being made to amend the label for BIFENTHRIN TECHNICAL INSECTICIDE/MITICIDE (EPA Reg. No. 70506-18) to expand the for formulation into uses to cover all potential formulation uses of the product. Please see the highlighted label noting the additional uses. We have also added the Spanish signal word with statement (though not required for a non-WPS product). In the Storage and Disposal section, the container handling statements have also been updated to include fiber drum with liner instructions.

The following are provided in support of this label amendment:

- Application for Pesticide Registration, EPA form 8570-1
- Highlighted label noting changes described above
- Clean label
- Data Matrix, EPA form 8570-34 Agency copy
- Data Matirx, EPA form 8570-34 Public copy
- Certification with Respect to Citation of Data, EPA form 8570-35

Should you require additional information or have questions concerning this submission, please contact me via email at crystal.layton@uniphos.com or phone at 229-583-3006.

Sincerely,

Crystal Layton Regulatory Manager